Original signed by Assistant Director Preczewski on Sep 17, 2007

Division of Air Quality Air Quality Permitting Element P.O. Box 027 Trenton, NJ 08625-0027

MEMORANDUM

TO: BOP/BPP Permit Writing Staff

FROM: John Preczewski, P.E.

Assistant Director

Air Quality Permitting Program

SUBJECT: Emergency Fire Pumps

DATE: September 17, 2007

Emergency fire pumps are regulated as "emergency generator", pursuant to N.J.A.C. 7:27-19. N.J.A.C. 7:27-19.1 defines "emergency generator" as a combustion source that:

- 1. Is located at a facility and produces mechanical or thermal energy, or electrical power exclusively for use at the facility;
- 2. Is the source of mechanical or thermal energy, or electrical power during an emergency when the primary source of energy is unavailable; and
- 3. Is operated only:
 - i. During the performance of normal testing and maintenance procedures, as recommended in writing by the manufacturer and/or as required in writing by a Federal or State law or regulation;
 - ii. When there is power outage or the primary source of mechanical or thermal energy fails because of an emergency; or
 - iii. When there is a voltage reduction issued by PJM and posted on the PJM internet website (www.pjm.com) under the "emergency procedures" menu.

The operation of an emergency fire pump during a fire satisfies the above definition, even if there is no power outage and the primary source of mechanical energy has not failed.

CC: John Walsh
Section Chief
Compliance & Enforcement